

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED
JAN 19 2022

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

SHELBY ADAMS, JALEN T.
MCKISSICK, and SHANE I.
THOMASON,

Defendants.

Criminal No.

1:22cr6 TSK/MJA

Violations:

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Violate Federal Firearms Laws)

On or about April 7, 2021, in Marion County, in the Northern District of West Virginia, the defendants **SHELBY ADAMS, JALEN T. MCKISSICK, and SHANE I. THOMASON** did combine, conspire, confederate and agree to commit an offense against the United States, that is, to knowingly make false written statements which were intended and likely to deceive a Federal Firearm Licensee regarding the lawfulness of the sale of a firearm in connection with the acquisition of a firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and other persons committed and caused to be committed the following overt acts in the Northern District of West Virginia:

1. On April 7, 2021, **SHELBY ADAMS, JALEN T. MCKISSICK, and SHANE I. THOMASON** traveled to a Federal Firearm Licensee to obtain firearms;
2. On April 7, 2021, **JALEN T. MCKISSICK and SHANE I. THOMASON** selected the firearms for **SHELBY ADAMS** to purchase on their behalf; and
3. On April 7, 2021, in Fairmont, West Virginia, **SHELBY ADAMS** completed an ATF Form 4473, making false statements that were intended and likely to deceive a Federal Firearm Licensee regarding the lawfulness of the sale of a firearm in connection with the attempted acquisition of a firearm, as further described in Count Two of the Indictment.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(False Statement During Purchase of Firearm)

On or about April 7, 2021, in Marion County, in the Northern District of West Virginia, defendant **SHELBY ADAMS**, aided and abetted by **JALEN T. MCKISSICK and SHANE I. THOMASON**, in connection with the purchase of a firearm, that is, a Taurus semi-automatic pistol, model G2C, 9mm caliber, serial number ACC647275; and a Glock semi-automatic, model 26 Gen5, 9mm caliber, serial number AFMF828, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements, which were intended and likely to deceive a licensed dealer of firearms, as to facts material to the lawfulness of such sale of said firearm to the defendant under chapter 44 of Title 18, in that defendant **SHELBY ADAMS** represented that she was the actual buyer of the firearm and not an illegal drug user on ATF Form 4473, when in fact as the defendant then knew, she was not the actual buyer of the firearm and she was an illegal drug user, in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including:

- A. a Taurus semi-automatic pistol, model G2C, 9mm caliber, serial number ACC647275;
- B. a Glock semi-automatic, model 26 Gen5, 9mm caliber, serial number AFMF828; and
- C. any associated ammunition.

A true bill,

/s/

Grand Jury Foreperson

/s/

WILLIAM J. IHLENFELD, II
United States Attorney

Christopher L. Bauer
Assistant United States Attorney